

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

VIRGINIA COALITION FOR IMMIGRANT
RIGHTS, *et al.*,

Plaintiffs,

v.

SUSAN BEALS, in her official capacity as
Virginia Commissioner of Elections, *et al.*,

Defendants.

Case No. 1:24-cv-1778

UNITED STATES OF AMERICA,

Plaintiff,

v.

COMMONWEALTH OF VIRGINIA, *et al.*,

Defendants.

Case No. 1:24-cv-1807

DECLARATION OF GRAHAM K. BRYANT

I, Graham K. Bryant, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am Deputy Solicitor General in the Office of the Virginia Attorney General. I am a member in good standing of the Virginia bar. I am admitted to practice in this Court.

2. I make this declaration based upon my personal knowledge, including facts ascertained through consultation with executive personnel in the Virginia Department of Elections (ELECT) and the Virginia Department of Motor Vehicles (DMV) who have assisted me in gathering this information and these materials. I make this declaration in support of Defendants' opposition to the Plaintiffs' motions for preliminary injunctions.

3. Attached as Exhibit A is a true and correct copy of the December 14, 2006 letter from John Tanner, then chief of the Voting Section of the Civil Rights Division of the United States Department of Justice, regarding preclearance of 2006 Va. Acts. ch. 926 under Section 5 of the Voting Rights Act.

4. Attached as Exhibit B are true and correct copies of the DMV's current applications for a driver's license, learner's permit, identification card, and commercial driver's license; change of address form; and voter registration questionnaire.

5. Attached as Exhibit C is a true and correct copy of the DMV's current application for a driver privilege card or an identification privilege card.

6. Attached as Exhibit D is a document first depicting true and correct copies of the screens presented to DMV customers completing an electronic motor voter transaction online on the DMV's website, and then depicting true and correct text representations of the screens presented to DMV customers completing an electronic motor voter transaction in person using credit card terminals at DMV customer service centers.

7. Attached as Exhibit E is a true and correct copy of ELECT's current Standard Operating Procedure, Voter Registration List Maintenance, Department of Motor Vehicles: Full SBE & Non-Citizen Files (revised Aug. 8, 2024), with minimal redactions to protect personal information of DMV employees and confidential information regarding DMV's internal computer systems.

8. Attached as Exhibit F is a true and correct copy of ELECT's publication, Hopper Processing and Information (revised Oct. 5, 2023), containing redactions necessary to protect the confidentiality of ELECT's internal computer systems.

9. Attached as Exhibit G is a true and correct copy of a Notice of Intent to Cancel and accompanying Affirmation of Citizenship form mailed by Fairfax County's general registrar on September 3, 2024, redacted to protect personal information.

10. Attached as Exhibit H is a true and correct copy of a voter registration cancellation notice sent by Arlington County's general registrar, redacted to protect personal information.

11. Attached as Exhibit I is Executive Order 35 issued by Governor Glenn Youngkin on August 7, 2024.

12. Attached as Exhibit J is a true and correct copy of an official advisory that ELECT issued to the general registrars for each locality on October 16, 2024 with the subject "Updated List Maintenance Calendar and Close of Books—Start of Same Day Registration."

I declare under penalty of perjury that, to the best of my knowledge, the foregoing is true and correct.

Executed on October 22, 2024 in Richmond, Virginia.



GRAHAM K. BRYANT (Va. Bar #90592)
Deputy Solicitor General